

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

LEADERS OF A BEAUTIFUL STRUGGLE
et al.,

Plaintiffs,

v.

BALTIMORE POLICE DEPARTMENT
et al.,

Defendants.

Civil Action No. 20-929

DECLARATION OF ALEXIA RAMIREZ

I, Alexia Ramirez, in accordance with 28 U.S.C. §1746 declare as follows:


1. I am an attorney at the American Civil Liberties Union Foundation and co-counsel for Plaintiffs Leaders of a Beautiful Struggle, Erricka Bridgeford, and Kevin James in the above-numbered action.

2. I submit this declaration in support of the Plaintiffs' Memorandum of Law in Support of Their Motion for a Temporary Restraining Order & a Preliminary Injunction.

3. The following Exhibits, attached hereto as Exhibits A to E and filed on April 9, 2020, represent true and correct copies, or true and correct copies of excerpts of such documents:

No.	Exhibit
A	BPD, Community Education Presentation: Aerial Investigation Research (AIR) Pilot Program (March 2020) ("BPD Presentation")
B	Professional Services Agreement, Aerial Investigation Research ("AIR") ("BPD/PSS Contract")
C	PSS, Hawkeye II, https://www.pss-1.com/hawkeye-ii (quotations from various web pages)
D	Yves-Alexandre de Montjoye et al., <i>Unique in the Crowd: The Privacy Bounds of Human Mobility</i> , 3 Sci. Reps. 1376 (2013), https://doi.org/10.1038/srep01376
E	PSS, NightHawk II, https://www.pss-1.com/nighthawk-ii (discussing camera that provides "affordable nighttime, wide area surveillance" including in "[p]artial moonlight")

I declare under penalty of perjury that the foregoing is true and correct. Executed on
April 9, 2020.


Alexia Ramirez